

PARSONS BEHLE & LATIMER
Jim B. Butler, Nevada Bar ID No. 8389
Ashley C. Nikkel, Nevada Bar ID No. 12838
50 West Liberty Street, Suite 750
Reno, NV 89501
Telephone: 775.323.1601
Facsimile: 775.348.7250
jbutler@parsonsbehle.com
anikkel@parsonsbehle.com

*Attorneys for Defendant
KG Mining (Bald Mountain) Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LAURA LEIGH, individually, and WILD
HORSE EDUCATION, a non-profit
corporation,

Plaintiffs,

vs.

INTERIOR BOARD OF LAND APPEALS,
UNITED STATES DEPARTMENT OF
INTERIOR, BUREAU OF LAND
MANAGEMENT, and KG MINING INC.,

Defendants.

Case No. 3:25-cv-00039-ART-CSD

**MOTION TO EXTEND KG MINING
(BALD MOUNTAIN) INC.'S
OPPOSITION AND CROSS-MOTION
FOR SUMMARY JUDGMENT
DEADLINE**

(First Request)

Pursuant to Local Rules IA 6-1 and 7-1, Defendant KG Mining (Bald Mountain) Inc.¹ (“KG Mining”) hereby requests the Court extend its combined Opposition and Cross-Motion for Summary Judgment (“Opposition/MSJ”) deadline, currently set for **October 10, 2025**.

On October 2, 2025, the Chief Judge of the U.S. District Court for the District of Nevada issued General Order 2025-07 (“GO”). The GO stayed filing deadlines imposed upon the United States and federal agencies in civil actions due to the ongoing lapse in government appropriations.

KG Mining’s Opposition/MSJ was set for simultaneous submission with the Interior Board of Land Appeals, United States Department of Interior, and Bureau of Land Management

¹ Plaintiffs have named “KG Mining Inc.” as a Defendant, but no such entity exists.

1 (“Federal Defendants”). KG Mining submits good cause exists to extend its Opposition/MSJ
 2 deadline to track the Federal Defendants, as it would allow the parties to maintain an orderly
 3 briefing schedule in this administrative appeal concerning a decision of the Interior Board of Land
 4 Appeals. KG Mining has contacted counsel for Plaintiffs, who indicate they do not oppose this
 5 request.

6 The GO does not set a date certain but instead tiers the Federal Defendants’ new deadline
 7 to “the number of days equal in length (in days) of the lapse of appropriations plus ten days” in a
 8 situation where the lapse is more than seven days (as it is here). *See* GO, p. 1:19-22. Because this
 9 shift will impact the remaining deadlines in the Court’s May 1, 2025, scheduling order (ECF No.
 10 40), KG Mining respectfully requests that the Court extend or stay its deadline to file its
 11 Opposition/MSJ to track the Government’s deadline, and also order the parties to submit a joint
 12 proposed revised scheduling order within fourteen (14) days of resumption of appropriations.

13 This request is not being sought for the purpose of delay, and it is the first request for an
 14 extension of time for submission of KG Mining’s Opposition/MSJ.

15 DATED this 10th day of October, 2025. PARSONS BEHLE & LATIMER

16
 17 /s/ Ashley C. Nikkel
 18 Jim B. Butler, Nevada Bar ID No. 8389
 19 Ashley C. Nikkel, Nevada Bar ID No. 12838
 20 50 West Liberty Street, Suite 750
 21 Reno, NV 89501
 22 jbutler@parsonsbehle.com
 23 anikkel@parsonsbehle.com
 24 Attorneys for Defendant KG Mining (Bald
 25 Mountain) Inc.

26 IT IS SO ORDERED.

27 _____
 28 UNITED STATES DISTRICT COURT JUDGE

Dated: _____, 2025.